

**THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE	§	CHAPTER 7
	§	
LEGENDARY FIELD EXHIBITIONS, LLC.	§	CASE NO. 19-50900-CAG
	§	
AAF PLAYERS, LLC;	§	CASE NO. 19-50902-CAG
	§	
AAF PROPERTIES, LLC;	§	CASE NO. 19-50903-CAG
	§	
EBERSOL SPORTS MEDIA GROUP, INC.;	§	CASE NO. 19-50904-CAG
	§	
LFE 2, LLC;	§	CASE NO. 19-50905-CAG
	§	
WE ARE REALTIME, LLC	§	CASE NO. 19-50906-CAG
	§	
DEBTORS	§	
		(SUBSTANTIVE CONSOLIDATION OF ALL 6 CASES, INTO ONE CASE, LEGENDARY FIELD EXHIBITIONS, LLC, CASE NO. 19-50900-CAG) JOINTLY ADMINISTERED UNDER CASE NO. 19-50900-CAG)

**UNCONTESTED MOTION TO ALLOW LATE FILING OF
CLASS SETTLEMENT PROOF OF CLAIM OF ALONZO MOORE**

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

TO THE HONORABLE H. CRAIG A. GARGOTTA, U. S. BANKRUPTCY JUDGE:

1. Alonzo Moore, through duly appointed Class Counsel files this Uncontested Motion to Allow Late Filed Class Settlement Proof of Claim, and respectfully shows:
2. Randolph N. Osherow is the duly appointed Chapter 7 Trustee.

3. On October 26, 2021, the Court approved the Trustee's application to approve a settlement in Adversary Case No. 19-ap-05053 (the "Adversary") in pertinent part between the Trustee and a defined settlement class of former AAF players. (Docket No. 454).

4. The Court held a fairness hearing as required under Bankruptcy Rule 7023 in the Adversary and on February 8, 2022, entered its order of final approval of the class action settlement and certifying a plaintiff class of former players. (Docket No. 215 in AP 19-05053).

5. Pursuant to the final approval order, notice explaining the settlement, a claim form and instructions for submitting was sent to identified settlement class members, including Alonzo Moore.

6. Alonzo Moore is a member of the settlement class. The Notice to Class members generally required settlement class members to complete and return an enclosed claim form by January 31, 2022. Movant states that he completed the form and believes he deposited it with the USPS. Class Counsel has no record of receiving the form, but there appears no reason to doubt Mr. Moore's recollection.

7. Consistent with his recollection, Mr. Moore began inquiring as to the whereabouts of his distribution when he learned other former players were receiving them.

8. Mr. Moore has completed a replacement claim form, which Class Counsel has received on or about February 20, 2023. The replacement claim form is filed concurrently with this motion as Claim No. 742.

9. Movant requests permission for Class Counsel to file this claim form on the claims registry to obtain a partial distribution of settlement proceeds on the same terms, in the same amount, and subject to the same reductions and withholdings as other class members.

10. The estate currently has sufficient funds to make an interim distribution to Movant on the same basis as other settlement class wage claimants.

11. The Trustee does not oppose the entry of the requested relief.

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RELIEF REQUESTED

For the foregoing reasons, the Movant requests that the Court allow his late filed claim form on the claims registry so that it may receive an interim distribution and for such other and further relief to which the parties show themselves justly entitled.

Dated: March 24, 2023

Respectfully submitted,

/s/ Jonathon Farahi, Esq.

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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that on the 24th day of March 2023, a true and correct copy of the foregoing document was served via electronic means as listed on the Court's ECF noticing system and by electronic or first-class mail to those persons on the attached mailing matrix.

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